Accident Reporting and Recordkeeping Training

Safety Office Personnel

Lesson Summary

- This lesson consists of five sections:
  1. Overview/Responsibilities/Rights
  2. Accident Notification, Reporting, & Recordkeeping
     - Procedures for Recording Accidents
  3. Summary Reporting of Contractor Accidents and Exposure Hours
  4. Public Recreation Visitor Accident
  5. Safety & Occupational Health Office Personnel

Overview: Objectives

- At the end of the first section, you should be able to:
  - Describe your **responsibilities** and the **responsibilities** of all Corps employees to report work-related injuries and illnesses
  - Describe your **rights** and all Corps employees' **rights** to privacy in the Accident Reporting System and their **rights** to records of their accidents

Overview

Updated Federal Agency Recordkeeping Requirements

- Revisions to 29 CFR Part 1960
- Transition of Federal Agencies to the private sector requirements of 29 CFR 1904
- Amendments to the occupational injury and illness recording and reporting requirements applicable to Federal agencies
- Amendments to the forms used by Federal agencies to record those injuries and illnesses

Federal Employees' Compensation Act

- The changes in the OSHA requirements do not diminish or modify in any way a Federal Agency's responsibility to report or record injuries and illnesses as required by the Office of Workers' Compensation Programs under the Federal Employees' Compensation Act

Impacts

- All employees must complete basic training on accident reporting rights and responsibilities
- Supervisors and Team Leaders must learn the new accident recordability criteria and reporting procedures
- Contractor accident reporting procedures have changed

Responsibilities

Employee Responsibility

- All Corps employees and Corps Contractors have a responsibility to report all work-related accidents to their supervisors
- If their supervisors are unavailable, they should go to someone in the chain of Command to report that they have experienced a work-related accident
- The employees, or person acting on their behalf if they are unable to do so, must report the accident as soon as reasonably possible after the accident's occurrence

USACE Responsibility

- Establish a procedure for employees to report work-related injuries and illnesses
- Inform all employees on how he or she is to report an injury or illness

Employee Rights

Discrimination

- USACE Command shall not discriminate against any employee:
  - Who reports a work-related fatality, injury, or illness
  - Who files a safety and health complaint
  - Who asks for access to records or otherwise exercises any rights afforded by the OSHA Act

Privacy

- Your local Command may not enter the injured or ill employee's name on the OSHA forms in the cases that involve:
  - injury or illness to an intimate body part or the reproductive system
  - an injury or illness resulting from a sexual assault
  - mental illness
  - HIV infection, hepatitis, or tuberculosis
  - needle stick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material
  - any other injury or illness where the employee requests that his or her name not be entered on the Log

(continued)

Privacy (continued)

- The local Command must first remove the names of all injured and ill employees and other personally identifying information when providing OSHA forms to those other than Government representatives, employees, former employees, or authorized representatives

Copies of Records

- Upon request, the local Command must provide a copy of the injury log to any employee, former employee, personal representative, or authorized employee representative by the end of the next business day
- Upon request, the local Command must provide an authorized employee representative copies of incident reports as authorized by the OSHA standard within seven calendar days
- Each USACE establishment must post summary of accidents each year

Summary of Experience

- A signed and certified OSHA 300A Summary Record of previous year's accident experience from February 1st through April 30th of the subsequent year must be posted at each establishment

Overview: Summary

- This concludes the Overview section. You should now be able to:
  - Describe your **responsibilities** and the **responsibilities** of all Corps employees to report work-related injuries and illnesses
  - Describe your **rights** and Corps employees' **rights** to privacy in the Accident Reporting System and their **rights** to records of their accidents
- The next section discusses accident notification, reporting, and recordkeeping

Accident Notification, Reporting, and Recordkeeping

Accident Notification, Reporting, and Recordkeeping: Objectives

- At the end of this section, you should be able to:
  - Discuss parameters/definitions of recordability
  - Demonstrate basic knowledge of accident and recordkeeping regulations, procedures, and responsibilities
  - Access and utilize the ENGLink Accident Reporting System (ARS)

Informing Employees

- Local Commands must set up a way for employees to report accidents
- Supervisors must inform employees on how and when to report accidents
- Local Commands have flexibility to set up procedures that are appropriate to their workplace

Accident Notification, Reporting, and Recordkeeping Business Process

Four Steps:

1. Notification to chain of Command that an accident has occurred
2. Determination of whether accident is recordable
3. Investigation of the accident to determine causes and corrective actions
4. Documentation of the recordkeeping process by completing and processing the accident reports

Accident Recordability

- Injury and Illness to civilian and on-site contractor employees
- Property damage to Government and contractor owned or leased property
- Fatality of members of the public recreating at USACE facilities

Note: Corps **volunteer** accidents are **not** recordable

Government and Contractor Injury and Illness Recordability

- Definitions of ***recordability*** in the new OSHA requirements are distinctly different from the definitions used in the past

Inclusion Criteria for Contractor Accident Recordability

- Only record, in the USACE accident recordkeeping system, those contractor accidents that occur where compliance with EM 385-1-1 is a contractual requirement

Factors of Recordability

For an injury or illness to be recordable, it must be:

- Work-related
- New Case
- Meet OSHA Inclusion Criteria

If the case is work-related, a new case, and meets the inclusion criteria, it is recordable

Work-Relatedness

- A case is presumed work-related if, and only if, an event or exposure in the work environment is a discernable cause of the injury or illness or a significant aggravation to a pre-existing condition
- ***Significant*** aggravation of a pre-existing condition by a workplace event or exposure makes the case work-related
- Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment

Exceptions to Work-Relatedness

1) Member of the general public

2) Symptoms arising on premises totally due to outside factors

3) Voluntary participation in wellness program

4) Eating, drinking and preparing one's own food

5) Personal tasks outside working hours

(continued)

Exceptions to Work-Relatedness (continued)

6. Personal grooming, self-medication, self infliction

7. Motor vehicle accident in parking lot/access road during commute

8. Cold or flu

9. Mental illness unless employee voluntarily presents a medical opinion stating that the employee has a mental illness that is work-related

TDY

- If at the time of the injury or illness a civilian employee is in travel status and engaged in work activities "in the interest of the employer," then the injury or illness is work related

- Examples that would be considered work-related:
  - Travel to and from field project
  - Conducting official business while in travel status
  - Attending a training course or conference

TDY Exceptions

- Injuries or illnesses that occur when a civilian employee is in travel status are **not** recordable if the employee:
  - has checked into a hotel or motel for one or more days and is not in a duty status
  - has taken a detour for personal reasons

New Case

- Only new cases are recordable
  - Work-related injuries and illnesses are considered to be new cases when the employee:
    - has never reported similar signs or symptoms before
    - has recovered completely from a previous injury or illness and workplace events or exposures have caused the signs or symptoms to reappear

Recordable Injury/Illnesses

- Recordable work-related injuries and illnesses are those that result in one or more of the following:
  - Death
  - Days away from work
  - Restricted work beyond the date of injury
  - Transfer to another job
  - Medical treatment beyond first aid
  - Loss of consciousness

(continued)

Recordable Injury/Illnesses (continued)

- Diagnosis of a significant injury or illness
- Needlestick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material
- Medical removal under medical surveillance requirements of an OSHA Standard
- Occupational hearing loss that meets the OSHA criteria
- Work-related tuberculosis cases

Work Restrictions

- An employee's work is considered restricted when, as a result of a work-related injury or illness:
  - The supervisor keeps the employee from performing one or more of the routine functions of his/her job or from working a normal work schedule
  - A physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of his/her job, or not work a full work schedule that he or she would otherwise have worked
  - Restricted work activity limited to the day of injury does **not** make the case recordable

Medical Treatment

- Medical treatment means the management and care of a patient to combat disease or disorder by a physician or a licensed health care professional

- A work-related cancer, chronic irreversible disease, punctured eardrum, or fractured or cracked bone is a significant injury or illness that must always be recorded when diagnosed by a physician or a licensed health care professional regardless of days away from work, job transfer or work restrictions

Medical Treatment Exceptions

- For the purpose of accident recordability the following do not constitute medical treatment:
  - Visits to a physician or other licensed health care professional solely for observation and counseling
  - The conduct of diagnostics such as x-rays and blood tests
  - Administration of prescription medications used solely for diagnostic purposes (e.g., eye drops to dilate pupils)
  - First aid

First Aid

- Using non-prescription medication at non-prescription strength
- Administering tetanus immunizations
- Cleaning, flushing or soaking wounds on the surface of the skin
- Using wound coverings such as bandages, Band-Aids™, gauze pads, etc. or using butterfly bandages or Steri-Strips™
- Using hot or cold therapy

(continued)

First Aid (continued)

- Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc.
- Using temporary immobilization devices while transporting an accident victim
- Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister
- Using eye patches
- Removing foreign bodies from the eye using only irrigation or a cotton swab

(continued)

First Aid (continued)

- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
- Using finger guards
- Using massages
- Drinking fluids for relief of heat stress

(continued)

First Aid (continued)

- The previous list of First Aid treatments is comprehensive
- Any other medical procedure is considered medical treatment
- Examples:
  - 1 dose of prescription medicine is Medical Treatment
  - Over the counter medicine at prescription strength is Medical Treatment
  - Any number of hot/cold treatments is First Aid
  - Drilling a nail is First Aid
  - Butterfly bandage/Steri-Strip™ is First Aid

Specific Recordable Disorders

- Hearing loss which meets OSHA criteria
- Needlesticks and 'sharps injuries'
  - Record all needlesticks and injuries that result from sharp objects potentially contaminated with another person’s blood or other potentially infectious material
- Medical removal due to overexposure under provisions of other OSHA standards
- TB - Positive skin test when known workplace exposure to active TB disease has occurred

Government Direct Contractors

Under the new OSHA requirements, contractor employees who work under the direct day-to-day supervision of a USACE employee are considered USACE employees for accident recordkeeping purposes

(Continued)

Government Direct Contractors (continued)

Contractor accidents are recorded as Government employee accidents **ONLY** if the contractor employee is supervised on a daily basis by a Government employee

"Supervision" means hiring, directing, assigning, promoting, rewarding, transferring, furloughing, laying off, recalling, suspending, disciplining, or removing the employee

(continued)

Government Direct Contractors (continued)

Authorized contractor employees who may be directly supervised by USACE employees are generally limited to the following:

- Consultants
- Experts
- Contract students in the research and development laboratories

(continued)

Government Direct Contractors (continued)

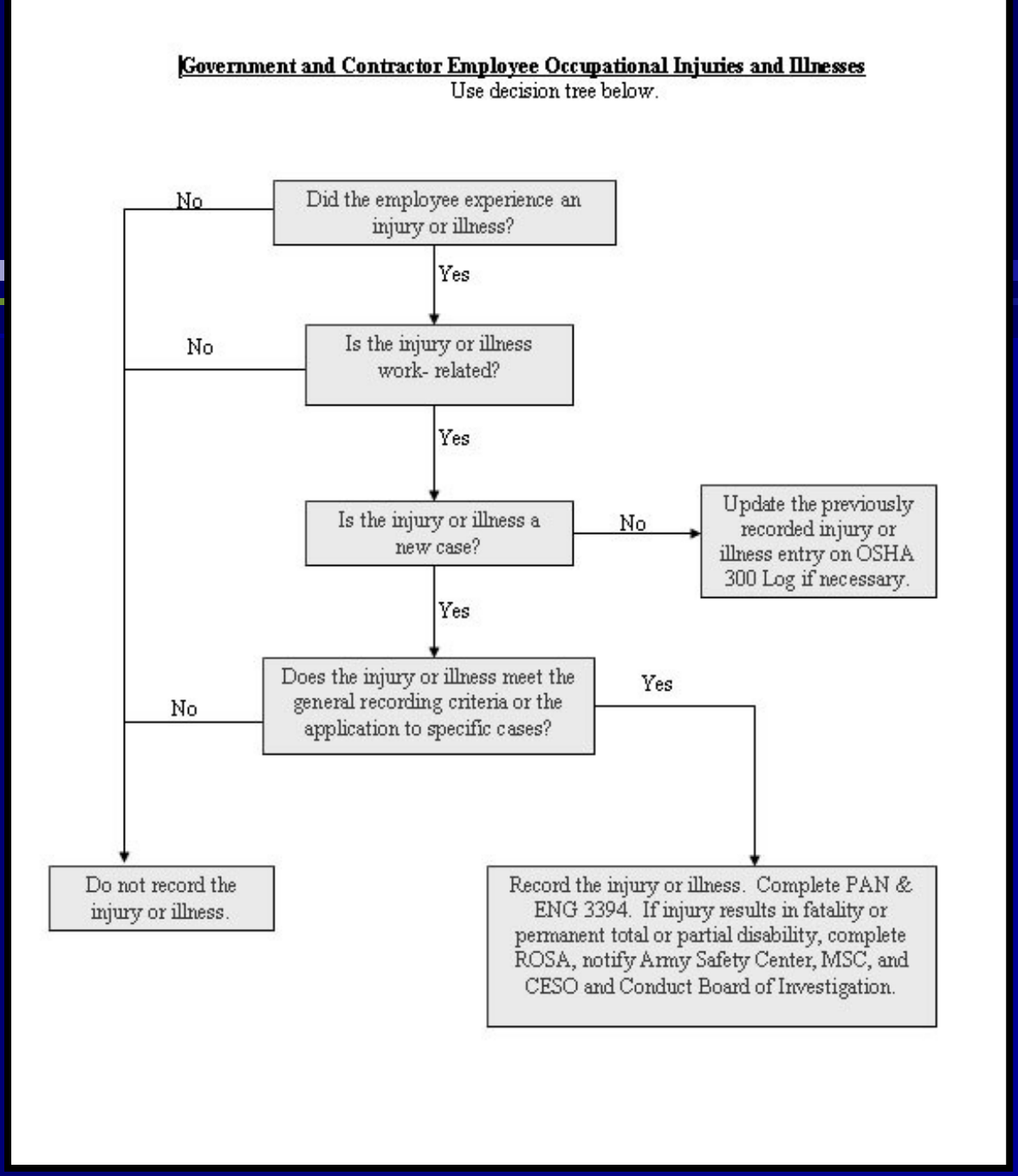
Exposure hours for Government Direct

Contractors must be captured and reported to

the local safety office separately from other

contractor exposure hours

Government & Contractor Employee Occupational Injuries & Illnesses


Government and Contractor Employee Occupational Injuries and Illnesses
Use decision tree below.
Did the employee experience an injury or illness?
No
Yes
Is the injury or illness work- related?
No
Yes
Is the injury or illness a new case?
No
Update the previously recorded injury or illness entry on OSHA 300 Log if necessary.
Yes
Does the injury or illness meet the general recording criteria or the application to specific cases?
No
Yes
Do not record the injury or illness.
Record the injury or illness. Complete PAN & ENG 3394. If injury results in fatality or permanent total or partial disability, complete ROSA, notify Army Safety Center, MSC, and CESO and Conduct Board of Investigation.

Government and Contrac

Resources

- Decision Trees for Reportability of Accidents
- Comparison of Old and New OSHA 1960 Recording and Reporting Requirements
- Frequently Asked Questions on OSHA 1960 Recording and Recordkeeping Requirements Adapted for USACE Application
- Training Sources for training on 29 CFR Part 1960 Recordkeeping and Reporting Requirements
- Guidance for Accessing the ENGLink Accident Reporting System and Creating a PAN
- USACE Accident Reporting and Recordkeeping Policy and Procedure

(continued)

Resources (continued)

Federal Register: November 26, 2004 (Vol. 69, No. 227) OSHA 29 CFR 1960, Basic Program Elements for Federal Employees Occupational Safety and Health Programs and Related Matters: Subpart I For Recordkeeping and Reporting Requirements: Final Rule

29 CFR 1904 Recording and Reporting Occupational Injuries and Illnesses

OSHA: Compliance Assistance & Recordkeeping

USACE Interim Implementation Guidance for New 29 CFR Part 1960 Recordkeeping and Reporting Requirements

Procedures for Recording Accidents

Schedule of Implementation

- Civilian Accident Recordkeeping Requirements – Effective date – 1 October 2005
- Contractor Accident Recordkeeping Requirements – Effective date - 8 March 2005
- Recreating Public Accident Recordkeeping Requirements – Effective date - 11 July 2005

All local Commands shall enter all Preliminary Accident

Notifications in ENGLink beginning no later than 1 Oct 2005

Establishments

The revised standard requires accident records to be maintained for each “establishment”

- An establishment is “a single physical location where business is conducted or where services or operations are performed”
- Typically, the term “establishment” refers to a field activity, regional office, area office, installation, or facility
- Each local Command Safety Office must identify each establishment within their Command

Maintenance of OSHA Accident Record Log

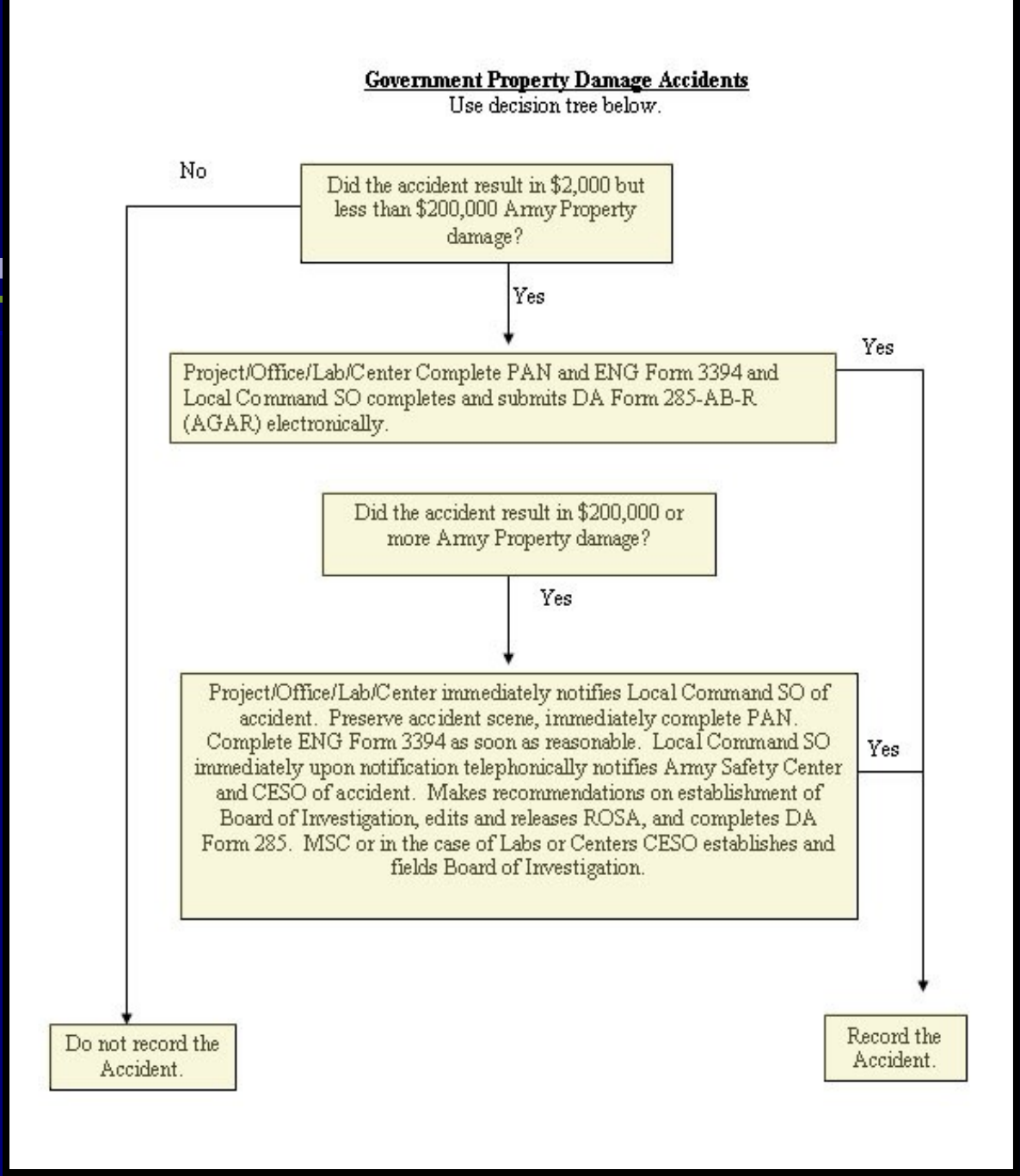
- OSHA accident records must be maintained for each establishment

- The records are not required to be physically maintained **at** each establishment; however, the records must be retrievable by the establishment within time constraints specified by OSHA

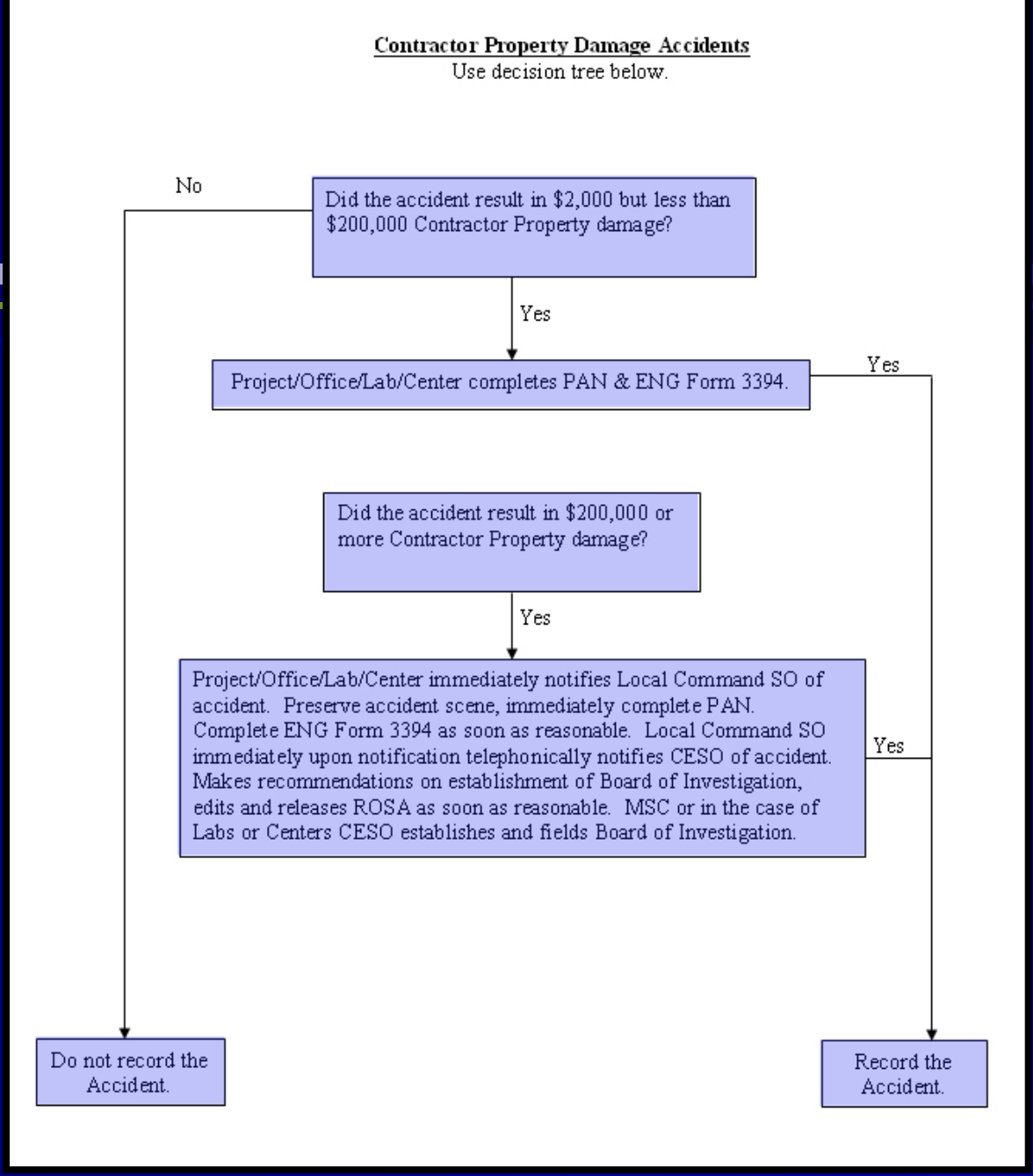
Property Damage Accident Recordability

- Government - $2,000 or greater damage to Corps owned or leased property or damage to any property as a result of Corps operations
- Contractor - $2,000 or greater damage to on-site property due to Contractor operations

Government Property Damage Decision Tree


Government Property Damage Accidents
Use decision tree below.
No
Did the accident result in $2,000 but less than $200,000 Army Property damage?
Yes
Yes
Project/Office/Lab/Center Complete PAN and ENG Form 3394 and Local Command SO completes and submits DA Form 285-AB-R (AGAR) electronically.
Did the accident result in $200,000 or more Army Property damage?
Yes
Project/Office/Lab/Center immediately notifies Local Command SO of accident. Preserve accident scene, immediately complete PAN. Complete ENG Form 3394 as soon as reasonable. Local Command SO immediately upon notification telephonically notifies Army Safety Center and CESO of accident. Makes recommendations on establishment of Board of Investigation, edits and releases ROSA, and completes DA Form 285. MSC or in the case of Labs or Centers CESO establishes and fields Board of Investigation.
Yes
Do not record the Accident.
Record the Accident.

Contractor Property Damage Decision Tree


Contractor Property Damage Accidents
Use decision tree below.
No
Did the accident result in $2,000 but less than $200,000 Contractor Property damage?
Yes
Project/Office/Lab/Center completes PAN & ENG Form 3394.
Yes
Did the accident result in $200,000 or more Contractor Property damage?
Yes
Project/Office/Lab/Center immediately notifies Local Command SO of accident. Preserve accident scene, immediately complete PAN. Complete ENG Form 3394 as soon as reasonable. Local Command SO immediately upon notification telephonically notifies CESO of accident. Makes recommendations on establishment of Board of Investigation, edits and releases ROSA as soon as reasonable. MSC or in the case of Labs or Centers CESO establishes and fields Board of Investigation.
Yes
Do not record the Accident.
Record the Accident.

Recreating Public Accident Reportability

The following types of Public accidents at Corps owned or operated property or facilities must be **reported**:

1. Accidents resulting in fatal or serious injuries to recreation visitors
2. Any accident, caused by USACE operations, to recreation or non-recreation visitors

(continued)

Recreating Public Accident Reportability (continued)

The following types of Public accidents at Corps owned or operated property or facilities **may be reported** at the discretion of the local Commander if such reporting would be of benefit in accident trend analysis or defense of tort claims or result in improvements to the facility's design safety:

- Accidents resulting in other than fatal or serious injuries to recreation visitors (e.g., cyclist injured after wrecking on bike path)
- Accidents resulting in fatal or non-fatal injury to non-recreation visitors (e.g., driver of vehicle proceeding through Corps property on a public road is injured when vehicle ran off road and into ditch during heavy rainstorm)

(continued)

Recreating Public Accident Reportability (continued)

Examples of

Reportable but not **Recordable** accidents

- Fatalities resulting from acts of God such as lightning strikes are reportable
- Deaths resulting from natural causes such as heart attack are reportable; (however, if the heart attack causes the person to fall into the lake and drown, the accident would be recordable)

(continued)

Recreating Public Accident Recordability (continued)

The only type of Public accidents at Corps owned or

operated property or facilities that must be **recorded**

in the USACE accident recordkeeping system are

accidents resulting in a fatality to recreation visitors

Exclusions to Recreating Public Accident Recordability

- Incidents of criminal acts or suspicious activity (e.g., murder, suicide, assault, terrorist activity) not involving a Government employee will be reported through security and law enforcement, not safety and occupational health channels

Geographic Limits for Reporting & Recording Recreating Public Accidents

- USACE owned or operated areas where CFR Title 36, Chapter III, Part 327, Parks, Forests, and Public Property is applicable

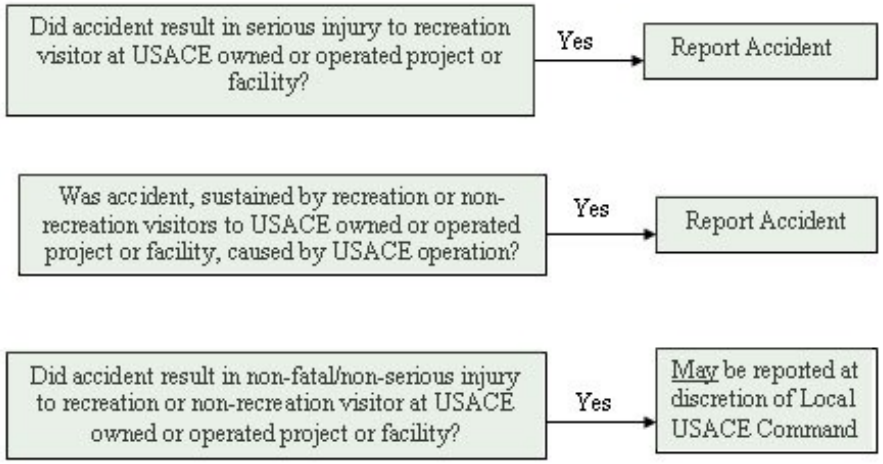
- This includes the water areas of any water resources development project administered by the Chief of Engineers and authorized under CFR Title 36 without regard to ownership of underlying land, to all lands owned in fee by the Federal Government and administered by USACE and to all facilities therein of any such water resources project

Member of Recreating Public Accident Decision Tree

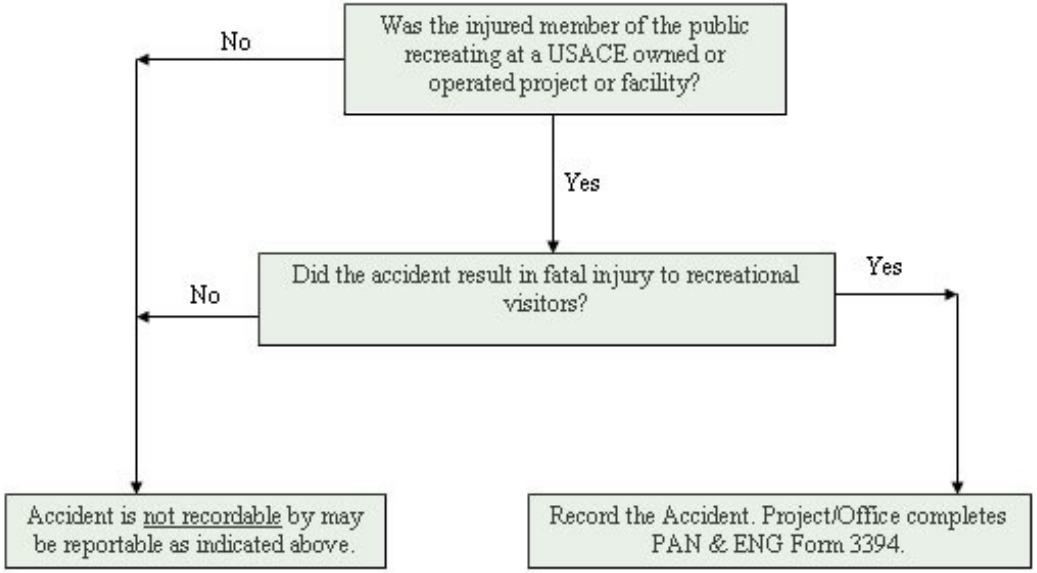
Public Recreation Accidents

Use the decision trees below.

Reportable Accidents


Did accident result in serious injury to recreation visitor at USACE owned or operated project or facility?
Yes
Report Accident
Was accident, sustained by recreation or non-recreation visitors to USACE owned or operated project or facility, caused by USACE operation?
Yes
Report Accident
Did accident result in non-fatal/non-serious injury to recreation or non-recreation visitor at USACE owned or operated project or facility?
Yes
May be reported at discretion of Local USACE Command

Recordable Accidents


Was the injured member of the public recreating at a USACE owned or operated project or facility?
No
Yes
Did the accident result in fatal injury to recreational visitors?
No
Yes
Accident is not recordable by may be reportable as indicated above.
Record the Accident. Project/Office completes PAN & ENG Form 3394.

Team Leader/Supervisor Responsibilities

When a team member reports an accident:

- Secure the accident scene
- Determine the recordability of the accident
- If recordable, initiate a Preliminary Accident Notification (PAN) in the Accident Reporting System in ENGLink

Preliminary Accident Notification (PAN)

- All employees who have a USACE UPASS user ID and Oracle password can access ENGLink and the Accident Reporting System to create a PAN
  - Training on the ENGLink Accident Reporting System (ARS) and how to create a Preliminary Accident Notification (PAN) is available on ENGLink at https://englink.usace.army.mil/
- If employees have difficulty accessing ENGLink, they should contact their local Information Management Office for assistance

ENG Form 3394 USACE Accident Investigation Report

After the PAN is completed the team leader/supervisor/contract administrator must:

- Thoroughly investigate the accident
- Determine causes and corrective actions
- Complete and staff ENG Form 3394, for Government, Contractor, and Public Accidents and
- Implement corrective actions

Initial Notification of Public Recreation Accident Work Sheet

Initial Notification of Public Recreation Accident Work Sheet

At an accident scene in a response mode, it is difficult to mentally recall the various data necessary to complete an initial notification and initiate an accident report. This worksheet is provided as a field tool to assist personnel to thoroughly document an accident and facilitate the completion of the accident investigation report.

Project Name: _____

Date of Accident: _____ Time of Accident: _____

Location and Incident Information

Location of Accident: _____

Inside Public Use Area: Yes/No Fee Area: Yes/No Inside a designated Swimming Area: Yes/No/Unknown Outgranted Area: Yes/No

Body Recovered: Yes/No Alcohol Involved: Yes/No/Unknown PFD Available: Yes/No/NA/Unknown PFD Worn: Yes/No

Property Involved: _____ Damage Estimate: _____

Activity at Time of Accident

Water Related Recreation	Non-Water Related Recreation	Other Activities
[ ] Sailing	[ ] Hiking and walking	[ ] Unlawful acts (fights, vandalism, riots, etc.)
[ ] Boating-powered	[ ] Climbing	[ ] Food Preparation/serving
[ ] Boating-unpowered	[ ] Camping/picnicing authorized area	[ ] Food Consumption
[ ] Water Skiing	[ ] Camping/picnicing unauthorized area	[ ] Housekeeping
[ ] Fishing from boat	[ ] Guided tour	[ ] Sleeping
[ ] Fishing from bank/dock/pier	[ ] Hunting	[ ] Pedestrian struck by vehicle

Optional Work Sheet for Initial Notification of Public Recreation Accidents

Accident Notification, Reporting, and Recordkeeping: Summary

- In this section, we discussed the following:
  - Parameters/definitions of recordability
  - Basic knowledge of accident and recordkeeping regulations, procedures, and responsibilities
  - Accessing and utilizing the ENGLink ARS
- The next section consists of information relating to summary reporting of contractor accidents and exposure hours

Summary Reporting of Contractor Accidents and Exposure Hours

Reporting of Contractor Accidents and Exposure Hours: Objective

At the conclusion of this section, you should be able to forward summary reports of contractor accidents and exposure hours

- Government Direct Contractors
  - Government Direct Contractor employees are those who work under the direct day-to-day supervision of a USACE employee
  - Government Direct Contractor employees are, under the new requirements, included with the Government accident experience and exposure for OSHA recordkeeping purposes
  - Their work hours of exposure shall be reported separately from other contractor work hours and included with the Government employee work hours of exposure when calculating accident rates

USACE Contractor Monthly Summary Record

- Submit to the Government Designated Authority (GDA) within the time limit established by the GDA
- Submit to the GDA in a manner (electronic, hardcopy) established by the GDA
- Unless otherwise specified by the GDA, this data shall be submitted by close of business on the 10th day of the following month

(continued)

USACE Contractor Monthly Summary Record (continued)

USACE PRIME CONTRACTOR

Monthly Record of Work-Related Injuries/Illnesses & Exposure

In accordance with the provisions of EM 385-1-1, Section 01 Program Management, Paragraph 01.D Accident Reporting and Recording, sub-paragraphs 01.D.05, you (the Prime Contractor) sh
provide a monthly record of all exposure and accident experience incidental to the work (this includes exposure and accident experience of the Prime Contractor and its sub-contractor(s). As a m
these records shall include exposure work hours and a record of occupational injuries and illnesses that include the data elements listed below. Definitional criteria for each data element is found in
Part 1904. If the maintenance of OSHA 300 Logs are required by OSHA, most of this information can be obtained from those logs. If data on log provided below is revised after it is submitted to U
Contractor shall provide a revised report to the GDA. You must complete the USACE ENG Form 3394, Report of Accident Investigation Report for all recordable accidents. If you're not sure whe
case is recordable, call your local Safety and Occupational Health Office for help.

Identify the person							Describe The Case	
(A)		(B1)	(B2)	(B3)	(C)	(D)	(E)	(F)
Company Name	Prime or Sub (P or S)	Age	Gender	Date Employee Began Work on Job Covered by Contract	Job Title (e.g., Welder)	Date of injury or onset of illness (mo./day)	Where the event occurred (e.g. Loading dock north end)	Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill (e Second degree burns on right forearm from acetylene tor

Inclusion Criterion for Contractor Exposure Hours & Accident Recordkeeping for Land-Based Activities

- The work environment for USACE contractors is defined as the physical location of the project site(s)

Inclusion Criteria for Contractor Accidents & Exposure Hours for Marine Activities

- For marine activity accident reporting only, the contractor's responsibility for reporting work-related accidents and exposure hours extends to the prime contractor, subcontractor personnel and equipment, and service and supply vendors

(continued)

Inclusion Criteria for Contractor Accidents & Exposure Hours for Marine Activities (continued)

Prime Contractor and subcontractor personnel and equipment (P&E) performing work in direct support of the contracted activity. This includes:

- Contractor P&E that have reported on-station in a contract-defined work area to begin work under project-funded pay or subcontract status
- Contractor P&E at all sites leased or used during contract work for storage, staging, anchorage, transiting, or deposit of materials
- Contractor P&E during mobilization or demobilization under terms of the contract

(continued)

Inclusion Criteria for Contractor Accidents & Exposure Hours for Marine Activities (continued)

- Service and supply vendors when they come under the direct operational control of a prime or subcontractor vessel master or project superintendent, such as:
  - When making final approach to make up to Contractor vessels/plant
  - While their vessels are made up to Contractor vessels, structures, or equipment
  - During delivery of materials or on-board a vessel
  - When casting off and navigating away from Contractor vessels/plant

Revising the Record

- If the outcome or extent of injury/illness changes after the record has been submitted to the GDA, then the record should be revised and resubmitted to the GDA on or before the date that the subsequent monthly report is to be submitted

Government Designated Authority

- The GDA shall, upon receipt of the completed prime contractor monthly report, review its content, complete the “For Government Use Only” shaded area, and electronically transmit to the Local Command Safety and Occupational Health Office no later than COB the 12th day of the month following that for which data is being furnished

- The GDA must also review any contractor submitted ENG 3394, complete their portion and forward to their local Safety and Occupational Health Office as locally prescribed

Contractor Accident Resources

For additional information, please click on the following resources:

- Contractor Monthly Record of Work-Related Injuries/Illnesses & Exposure
- USACE Local Command Monthly - Quarterly Contractor Exposure Report
- Interim Guidance for Contractor Accident Reporting & Recordkeeping
- Summary Guide for Completing USACE Contractor Monthly Summary Record of Injuries/Illnesses & Work Hour Exposure

Reporting of Contractor Accidents and Exposure Hours: Summary

- You should now be able to:
  - Forward summary reports of contractor accidents and exposure hours to the local Safety Office
- The next section consists of information related specifically to the responsibilities of Safety & Occupational Health Office Personnel

Safety & Occupational Health Office Personnel

Safety & Occupational Health Office Personnel: Objectives

- At the end of this section, you should be able to:
  - Demonstrate how to access and utilize the ENGLink Accident Reporting System (ARS)
  - Establish ARS permissions for your Command
  - Manage and oversee the accident recordkeeping system for your Command

Managing the Revised Accident Recordkeeping System

Safety Office Personnel Responsibilities

- Ensure a system is implemented to report accidents throughout the local Command
- Ensure all employees are trained in their rights and responsibilities regarding accident reporting and recordkeeping
- Ensure team leaders, supervisors, and contract administrators are trained to document accidents in the accident recordkeeping system
- Serve as the office of record for the local Command accident records

(continued)

Safety Office Personnel Responsibilities (continued)

- Request roles in ENGLink for local Command Safety Office personnel to manage the Preliminary Accident Notifications entered into the Accident Reporting System
- Perform quality control on the Preliminary Accident Notifications to assure that all recordable accidents are entered into the Accident Reporting System
- Ensure an ENG form 3394 is completed for all recordable accidents
- Ensure the local Command OSHA 300 log is accurate

(continued)

Safety Office Personnel Responsibilities (continued)

- In accordance with OSHA, provide copies of OSHA forms to employees, former employees, employee representatives and OSHA representatives upon request
- Ensure the privacy of injured/ill employees is protected in accordance with OSHA regulations
- Advise Commander and leaders regarding the prohibition of discrimination against employees when they report accidents
- For OSHA accident recordkeeping purposes, identify the establishments within the local Command
- Ensure that OSHA 300A summary reports are generated, certified, and posted at each establishment

(continued)

Safety Office Personnel Responsibilities (continued)

- Ensure upward reporting of Command accident experience and exposure is accomplished within the prescribed timeframes

- In the event of a serious accident which requires a Board of Investigation, ensure:
  - Immediate notification is accomplished
  - A ROSA is edited and released
  - A Board of Investigation is formed and investigation is completed within the prescribed timeframes

Forms

Old Part 1960 Rule

- OSHA 200 - Log and Summary
- OSHA 101 - Supplemental Record

Updated Part 1960 Rule

- OSHA 300 - Log
- OSHA 300A - Summary
- OSHA 301 - Incident Report

ARS Roles

Safety Report Editor –

- View and edit ROSA
- View released PAN in their local Command
- When a PAN is at least 7 days old, can modify PAN

Safety Report Manager –

- View, edit and release ROSA in their local Command and any subordinate Commands
- Once a PAN is at least 7 days old, can modify and release PAN
- View logs

(continued)

ARS Roles (continued)

- **Safety Report Viewer–**
  - View all released PANs and ROSAs in their local Command and subordinate Commands
- **Safety Report Administrator (HQ Personnel Only) –**
  - View, edit and release PAN and ROSA for the entire Corps of Engineers

OSHA Form 300

OSHA's Form 300

Log of Work-Related Injuries and Illnesses

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

You must record information about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid. You must also record significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR 1904.8 through 1904.12. Feel free to use two lines for a single case if you need to. You must complete an injury and illness incident report (OSHA Form 301) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OSHA office for help.

Establishment name

City

Identify the person			Describe the case			Classify the case			
(A) Case No.	(B) Employee's Name	(C) Job Title (e.g., Welder)	(D) Date of injury or onset of illness (mo./day)	(E) Where the event occurred (e.g. Loading dock north end)	(F) Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill (e.g. Second degree burns on right forearm from acetylene torch)	Using these categories, check ONLY the most serious result for each case:			
						Death	Days away from work	Remained at work	
								Job transfer or restriction	Other record-able cases
						(G)	(H)	(I)	(J)
					Page totals	**0**	**0**	**0**	**0**

Be sure to transfer these totals to the Summary page (Form 300A) before yo

Public reporting burden for this collection of information is estimated to average 14 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave, NW, Washington, DC 20210. Do not send the completed forms to this office.

Page

USACE Equivalent to OSHA Form 300A Summary of Work-Related Injuries & Illnesses

OSHA's Form 300A

Summary of Work-Related Injuries and Illnesses

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

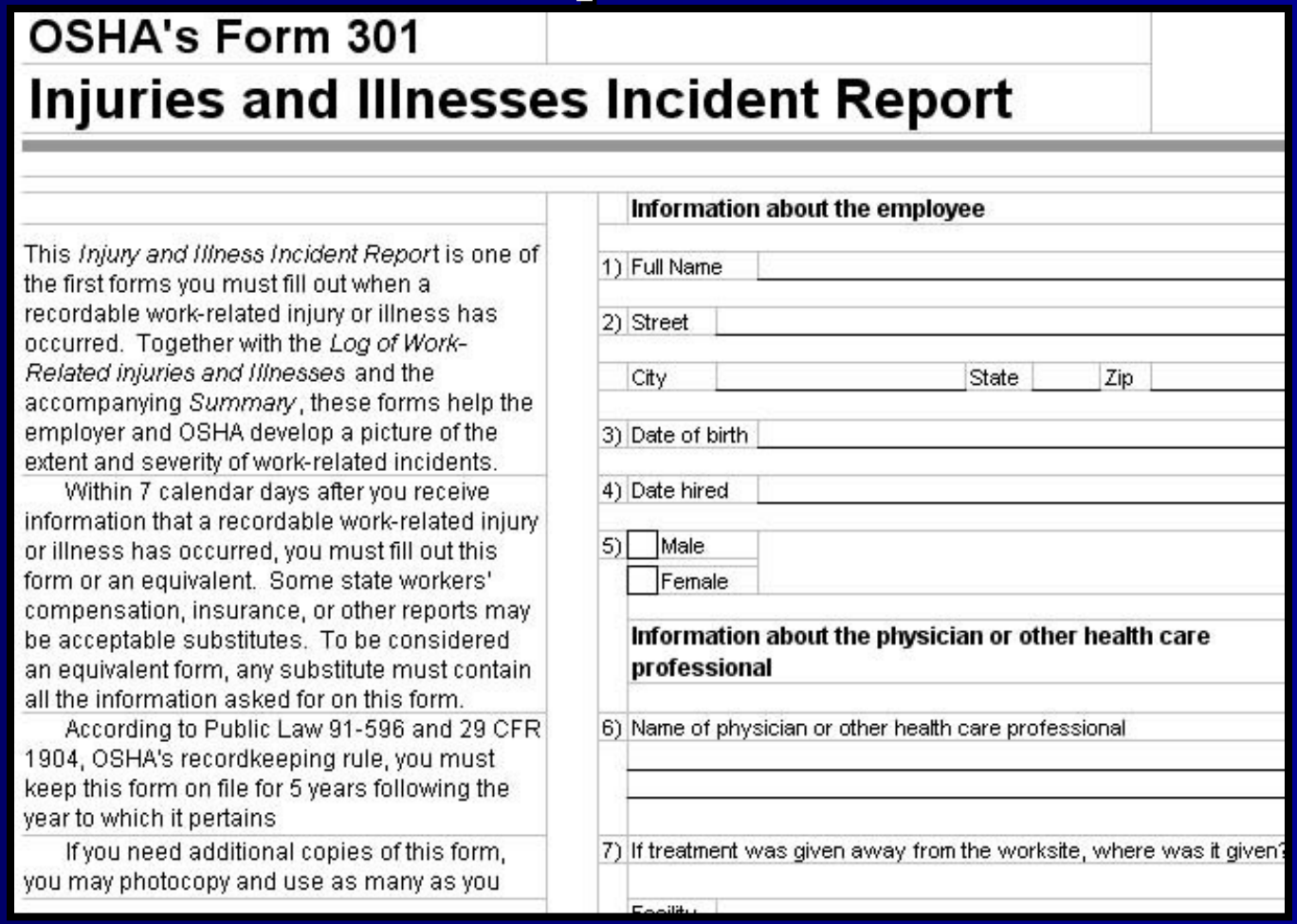
Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	0	0	0
(G)	(H)	(I)	(J)

Number of Days

USACE Equivalent to OSHA Form 301 Injury & Illness Incident Report



OSHA's Form 301

Injuries and Illnesses Incident Report

This *Injury and Illness Incident Report* is one of the first forms you must fill out when a recordable work-related injury or illness has occurred. Together with the *Log of Work-Related injuries and Illnesses* and the accompanying *Summary*, these forms help the employer and OSHA develop a picture of the extent and severity of work-related incidents.

Within 7 calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form or an equivalent. Some state workers' compensation, insurance, or other reports may be acceptable substitutes. To be considered an equivalent form, any substitute must contain all the information asked for on this form.

According to Public Law 91-596 and 29 CFR 1904, OSHA's recordkeeping rule, you must keep this form on file for 5 years following the year to which it pertains

If you need additional copies of this form, you may photocopy and use as many as you

Information about the employee

1) Full Name

2) Street

City State Zip

3) Date of birth

4) Date hired

5) ☐ Male
☐ Female

Information about the physician or other health care professional

6) Name of physician or other health care professional

7) If treatment was given away from the worksite, where was it given?

Facility

ENG 3394

(For Safety Staff only)	REPORT NO.	EROC CODE	UNITED STATES ARMY CORPS OF ENGINEERS ACCIDENT INVESTIGATION REPORT *(For Use of this Form See Help Menu and USACE Suppl to AR 385-40)*	REQUIREMENT CONTROL SYMBOL: CEEC-S-8(R2)

1. ACCIDENT CLASSIFICATION

PERSONNEL CLASSIFICATION	INJURY/ILLNESS/FATAL	PROPERTY DAMAGE	MOTOR VEHICLE INVOLVED	DIVING
GOVERNMENT ☐ CIVILIAN ☐ MILITARY	☐	☐ FIRE INVOLVED ☐ OTHER	☐	☐
☐ CONTRACTOR	☐	☐ FIRE INVOLVED ☐ OTHER	☐	☐
☐ PUBLIC	☐ FATAL ☐ OTHER		☐	

2. PERSONAL DATA

a. Name *(Last, First, MI)*	b. AGE	c. SEX ☐ MALE ☐ FEMALE	d. SOCIAL SECURITY NUMBER	e. GRADE

f. JOB SERIES/TITLE	g. DUTY STATUS AT TIME OF ACCIDENT	h. EMPLOYMENT STATUS AT TIME OF ACCIDENT
	☐ ON DUTY ☐ TDY ☐ OFF DUTY	☐ ARMY ACTIVE ☐ ARMY RESERVE ☐ VOLUNTEER ☐ PERMANENT ☐ FOREIGN NATIONAL ☐ SEASONAL ☐ TEMPORARY ☐ STUDENT ☐ OTHER *(Specify)* _____

Upward Reporting

Immediately upon notification, the local Command Safety Office must report:

- Class A and Class B Government and Contractor Accidents - to the respective HQ-Forward Safety Manager (if in the chain of Command) and the HQUSACE Safety and Occupational Health Office (CESO)

- Class A and Class B Government Accidents - through the chain of Command to the Commander, US Army Combat Readiness Center by telephone. This notification, at a minimum will contain the information on DA Form 7305-R, Worksheet for Telephonic Notification of Ground Accident

(continued)

Upward Reporting (continued)

- Within 8 hours, Government employee fatalities and incidents involving the hospitalization of three or more Government employees must be orally reported to the nearest OSHA office, or the OSHA hotline, and through their chain of Command to CESO
  - Note: There is an exception to the OSHA notification for certain motor vehicle or public transportation accidents; however, notification of these accidents must still be made through the chain of Command to CESO

Report of Serious Accident (ROSA)

- If the accident meets the definition of a Class A or B accident, a Report of Serious Accident (ROSA) will be automatically populated from the PAN and sent to the person(s) with Safety Report Manager role for editing and release up the chain of Command

Board of Investigation (BOI)

- Board of Investigation reports will continue to be completed in accordance with AR 385-40 and other USACE policy and guidance for Class A and Class B Government and contractor accidents

Maintaining OSHA Form 300 Logs

- OSHA Form 300 Log must be maintained for each establishment
  - The Log must include all recordable injuries and illnesses to USACE employees

(continued)

Maintaining OSHA Form 300 Logs (continued)

The Log is not required to be maintained at each subordinate establishment

- It may be centrally maintained at the MSC, District, Lab, or Center
- You must transmit information about the injuries and illnesses from the establishment to the central location within seven calendar days of receiving information that a recordable injury or illness has occurred
- You must be able to produce and send the records from the central location within the timeframes required by 29 CFR 1904.35 and 1904.40 when you are required to provide records to Government representatives, employees, former employees, or

Section Summary

- In this section we have provided the following information:

1. Overview/Responsibilities/Rights
2. Accident Notification, Reporting, & Recordkeeping
3. Collection and Upward Reporting of Contractor Accidents and Exposure Hours
4. Safety & Occupational Health Office Personnel responsibilities on managing the Command accident reporting and recordkeeping processes and procedures

Section Summary

Your Accident Reporting and Recordkeeping Training is now complete